

LATHAM & WATKINS LLP

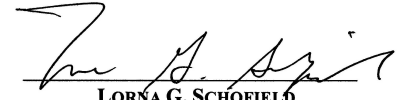
February 21, 2020

Application GRANTED. The Clerk of Court is respectfully requested to close the motion at Dkt. No. 172.

VIA ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Dated: February 24, 2020
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Jane Doe, et al. v. The Trump Corporation, et al., 18-cv-09936 (LGS)

Dear Judge Schofield:

We write on behalf of nonparties JMBP, LLC (“JMBP”) and Metro-Goldwyn-Mayer Studios Inc. (“MGM”), pursuant to Rule I.D.3 of Your Honor’s Individual Rules and Procedures for Civil Cases (the “Individual Rules”), to respectfully request provisional approval to file under seal certain exhibits attached to the declaration of Jessica Stebbins Bina, submitted in support of JMBP and MGM’s opposition to plaintiffs’ motion to compel.

JMBP and MGM have provisionally filed the documents under seal and have filed provisionally redacted versions of the same on the public docket. In accordance with this Court’s February 10, 2020 Order, JMBP and MGM will file a consolidated letter by March 3, 2020, explaining why certain information in plaintiffs’ motion to compel, JMBP and MGM’s opposition, and plaintiffs’ reply should remain redacted or sealed.

Best regards,


Jessica Stebbins Bina (*admitted pro hac vice*)
of LATHAM & WATKINS LLP

cc: All counsel of record (via ECF)